

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF MICHIGAN

PEDRO MONTOYA
On Behalf of himself
and All Others Similarly Situated

PLAINTIFF,

V.

Case No. 2:16-cv-14054
Hon. George Caram Steeh

TRINTY HEALTH-MICHIGAN dba MERCY
HEALTH SAINT MARYS and NPAS, INC.,

DEFENDANT(s).

DEFENDANT'S WITNESS LIST

NOW COMES the Plaintiff, Pedro Montoya, by and through counsel, and for his Witness
List presents the following:

WITNESS LIST

1. **Pedro Montoya**, c/o Nicholas A. Reyna, 528 Bridge Street, Ste. 1A, Grand Rapids, Michigan 49504.
2. Defendant Trinity Health-Michigan dba Mercy Health Saint Mary's, including any representative thereof with direct contact with the Plaintiff either orally or in writing, or who might otherwise have knowledge of the records of the Plaintiff.
3. Defendant NPAS, Inc., including any representative thereof with direct contact with the Plaintiff either orally or in writing, or who might otherwise have knowledge of the records of the Plaintiff.
4. All parties to the suit including agents, employees, and personnel thereof.

5. All witnesses named by the Defendants
6. All necessary rebuttal witnesses.
7. Vendors either NPAS or Trinity hired to create and/or mail the letters sent out in this case.
8. NPAS and Trinity persons or liaisons for each Defendant responsible for coordinating the capturing of the Trinity file and passing it on to NPAS for collection of Mr. Montoya's debt through the letters attached to the Complaint.
9. Defendant Trinity FDCPA Compliance Officer.
10. Person from Trinity in charge of coordinating the collection of the Montoya debt by using NPAS.
11. Plaintiff reserves the right to add additional witnesses as they become known through discovery.

RESPECTFULLY SUBMITTED,
LAW OFFICES OF NICHOLAS A. REYNA, P.L.L.C.

Date: March 30, 2017

/s/ Nicholas A. Reyna
Nicholas A. Reyna (P68328)
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